

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA

In re)
)
Stacie Irene Spence) CASE NO. 14-11752 NLJ
) CHAPTER 13
Debtor)

**OBJECTION TO MOTION TO DISMISS,
MOTION TO MODIFY CONFIRMED PLAN,
REQUEST FOR COMPENSATION OF ATTORNEYS FEES,
BRIEF IN SUPPORT
AND NOTICE OF OPPORTUNITY FOR HEARING**

COMES NOW Debtor, Stacie Irene Spence, and objects to the Motion to Dismiss of the Chapter 13 Trustee, and Moves the Court for an order modifying the chapter 13 plan confirmed by the court on July 25, 2014 and in support thereof, states as follows:

1. On April 25, 2014, the Debtor filed a Petition under Chapter 13 of the Bankruptcy Code.
2. On July 25, 2014, this Court entered its Order Confirming Plan.
3. Debtor moves to modify the Chapter 13 Plan, to wit:
 - a. The Debtor be treated as current through September, 2014.
 - b. Payments to be \$659.00 per month beginning October, 2014 and for the remainder of the plan.
 - c. To provide that counsel for Debtor receive \$500.00 for post-confirmation services rendered in this matter to be paid pursuant to the Local Guidelines concerning post-confirmation services, and without the necessity of filing an application for the same.
4. The modification is necessary to make the plan feasible and to allow for the proper payment of the proof of claim filed by the OKLAHOMA TAX COMMISSION.

WHEREFORE, premises considered, Debtor respectfully requests this Court issue an Order Modifying Debtor's Chapter 13 Plan. Further, Debtor's attorney requests that she be compensated as requested.

Respectfully submitted,

/s Tearsa Storms Olson

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Tearsa Storms Olson OBA#30264
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Oklahoma City, OK 73107
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Attorney for Debtor

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than twenty-one (21) days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided in Bankruptcy Rule 9006(f).

CERTIFICATE OF SERVICE

This is to certify that on the **19th** day of **September, 2014**, a true and correct copy of the **Objection to Motion to Dismiss, Motion to Modify Confirmed Plan, Request for Compensation of Attorneys Fees, Brief in Support and Notice of Opportunity for Hearing** [Document No. 24] filed on the **19th** day of **September, 2014** was forwarded via U.S. Mail, first class, postage prepaid, to the following:

All creditors on the attached mailing matrix.

/s/ Tearsa Storms Olson
Tearsa Storms Olson, OBA# 30265

Label Matrix for local noticing
1087-5
Case 14-11752
Western District of Oklahoma
Oklahoma City
Fri Sep 19 18:32:01 CDT 2014

Accident and Trauma Center
PO Box 722290
Norman OK 73070-8731

American InfoSource LP as agent for
T Mobile/T-Mobile USA Inc
PO Box 248848
Oklahoma City, OK 73124-8848

Auto Advantage Finance, Inc.
5350 S. Western Ave., 4th Floor
Oklahoma City, OK 73109-4520

Caine & Weiner
Po Box 5010
Woodland Hills CA 91365-5010

Cer Sts Rec
1314 N Main St
Hutchinson KS 67501-4002

Conn Appliances, Inc. as Attorney-in-Fact an
P.O. Box 2358
Beaumont, Texas 77704-2358

Covington Credit Inc #OK0018
Southern Management Corporation
PO Box 1947
Greenville SC 29602-1947

Credit Servi
Pob 60566
Oklahoma City OK 73146-0566

EMSA
1111 Classen Drive
Oklahoma City OK 73103-2607

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USBC Western District of Oklahoma
215 Dean A. McGee
Oklahoma City, OK 73102-3426

All American Fitness and Racquetball
Millennium Financial Group
5770 NW Expressway Suite 102
Oklahoma City OK 73132-5238

Ars /Account Resolution Services
1801 Nw 66th Ave Ste 200
Plantation FL 33313-4571

BancFirst
1213 Gordon Cooper Drive
Tecumseh OK 74873-1460

Cbe Group
131 Tower Park Dri
Waterloo IA 50701-9374

Classen Urgent Care
419 W Gray Street
Norman OK 73069-7117

Conns
Box 2358
Beaumont TX 77704-2358

Crdt Ctrl Co
11821 Rock Landing Dr
Newport News VA 23606-4207

Dept of Education
FedLoan Servicing
PO Box 69184
Harrisburg PA 17106-9184

Empire Finan
102 W Main St
Purcell OK 73080-4220

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AMCOL Systems, Inc.
Amcol Systems, Inc.
Po Box 21625
Columbia SC 29221-1625

American InfoSource LP as agent for
Integris Health
PO Box 248838
Oklahoma City, OK 73124-8838

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

Bancfirst
Po Box 26788
Oklahoma City OK 73126-0788

Central OK Chiropractic Clinic
602 N Broadway
Tecumseh OK 74873-2020

Community Hospital Outpatient Therapy
1001 S Western Ave
Oklahoma City OK 73139

Covington Credit
627 NW 7th Street
Oklahoma City OK 73160-3803

Credit Collections Inc/AMR
Po Box 60607
Oklahoma City OK 73146-0607

Direct Advertising Consultatns
PO Box 1369
Washington MO 63090-8369

Enhanced Recovery Corp
Attention: Client Services
8014 Bayberry Rd
Jacksonville FL 32256-7412

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 Exp Cr Auto
 HSN Flexpay Dept
 4000 N May PO Box 9090
 Oklahoma City OK 73112-6269 Clearwater FL 33758-9090
 IC System
 Attn: Bankruptcy
 444 Highway 96 East; Po Box 64378
 St. Paul MN 55164-0378

Integris ER Physicians PO Box 48305 Jacksonville FL 32247-8305	Integris Health Baptist PO Box 268907 Oklahoma City OK 73126-8907	Internal Revenue Service PO Box 7346 Philadelphia PA 19101-7346
Internal Revenue Service - OKC Mailstop 5024 OKC 55 N Robinson Oklahoma City OK 73102-9229	Jefferson Capital Systems LLC Po Box 7999 Saint Cloud Mn 56302-7999	Kankin and Woods Chiropractic 828 Wall Street Norman OK 73069-6302
Mercy Clinic PO Box 2580-OK Springfield MO 65801	Mercy Health Systems 1730 E Portland Springfield MO 65804-1311	Mercy Hospital 4300 W Memorial Rd Oklahoma City OK 73120-8304
Mercy Physicians 4300 W Memorial Rd Oklahoma City OK 73120-8304	Millenium 5770 Nw Expressway Ste 1 Warr Acres OK 73132-5241	National Credit Adjusters PO Box 3023 Hutchinson KS 67504-3023
OKLAHOMA TAX COMMISSION General Counsel's Office 120 N. Robinson, Ste 2000W Oklahoma City, OK 73102-7801	Oklahoma Sports Science and Ortho 3110 SW 89, Suite 102 Oklahoma City OK 73159-7919	(p)OKLAHOMA TAX COMMISSION 120 N ROBINSON STE 2000W OKLAHOMA CITY OK 73102-7801
Oklahoma Unemployment Commission PO Box 52004 Oklahoma City OK 73152-2004	Pottawatomie Telephone Company PO Box 66 Earlsboro OK 74840-0066	React Emergency 2316 N Airport Drive Shawnee OK 74804-2624
Security Fin C/o Security Finan Spartanburg SC 29304	Shawnee NewsStar 215 N Bell Shawnee OK 74801-6982	Southwest Regional Imaging and Radiology 3209 NW Expressway Oklahoma City OK 73112-4131
Southwestern Bell Telephone Company % AT&T Services, Inc Karen Cavagnaro, Paralegal One AT&T Way, Room 3A104 Bedminster, NJ 07921-2693	Stapleton Law PO Box 720981 Norman OK 73070-4759	Steven Richards PO Box 36-0119 Oklahoma City OK 73196-0001
Tab Services PO Box 52039 Tulsa OK 74152-0039	Thai An Doan DDS PC 11318 N May Ave Ste B Oklahoma City OK 73120-5843	U.S. Trustee United States Trustee 215 Dean A. McGee Ave., 4th Floor Oklahoma City, OK 73102-3444

Case: 14-11752 Doc: 24 Filed: 09/19/14 Page: 5 of 5 Unity 1900 Gordon Cooper Drive Shawnee OK 74801-8603	Valarity Llc P O Box 505023 Saint Louis MO 63150-5023	Webbmk/fstr 6250 Ridgewood Rd Saint Cloud MN 56303-0820
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cox communications po box 470800 tulsa, OK 74147-0800	John T. Hardeman PO Box 1948 Oklahoma City, OK 73101-1948	(c) STACIE IRENE SPENCE 5475 156TH ST NOBLE OK 73068-6723
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Tearsa Storms Olson
 Storms Law Office
 2400 NW 23rd St., Ste. 102
 Oklahoma City, OK 73107-2438

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Oklahoma Tax Commission
 Bankruptcy Section
 General Counsel
 Box 53248
 Oklahoma City OK 73152-3248

Addresses marked (c) above for the following entity/entities were corrected
 as required by the USPS Locatable Address Conversion System (LACS).

Stacie Irene Spence
 5475 SE 156th
 Noble, OK 73068

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Auto Advantage Finance, Inc.	End of Label Matrix
	Mailable recipients 66
	Bypassed recipients 1
	Total 67